REMARKS

In the Office Action, claims 1-10 and 12-25 were rejected and claim 11 was objected to as containing allowable subject matter but being dependent on a rejected base claim. Applicants thank the Examiner for noting the allowable subject matter in the present application. By the present Response, Applicants have amended claim 23 to correct clerical errors, added new claim 26, and cancelled claim 7 without prejudice. Applicants respectfully assert that no new matter has been added by this new claim or by the claim amendments. Upon entry of the amendments, claims 1-6 and 8-26 will be pending in the present application. In view of the foregoing amendments and following remarks, Applicants respectfully request reconsideration and allowance of all pending claims.

Summary of Exemplary Embodiment

Before addressing the specifics of the presented rejections, Applicants believe the following review of certain embodiments of the present technique, which are described in greater detail in the pending application, will be helpful in expediting examination of all pending claims to allowance.

Exemplary embodiments of the present technique provide a locking assembly 24 for a removable computer component 12, such as a disk drive or memory module. *See* Application, ¶¶ [0013], [0014]. To facilitate removal or insertion of the removable component 12 with respect to the computer device 10, the component includes a lever 22. *See id.* at ¶ [0016]. In summary, actuation of the lever 22 provides leverage that is particularly helpful in overcoming the engagement and disengagement forces between the connectors of the computer device 10 and computer component 12. *See id.* at [0016]. The exemplary locking assembly 24, however, interacts with this lever 22 to mitigate the risk of inadvertent engagement or disengagement of the removable component 12. *See id.* at ¶¶ [0016]-[0017]; FIG. 1. As an example, the locking assembly 24 may include a bolt mechanism 52 that impinges on the path of travel of the pivotable lever 22, by engaging with the lever 22. *See id.* at ¶ [0018]. Thus, the bolt

mechanism prevents inadvertent engagement or disengagement of the removable component 12 with the computer device 10.

Actuation of this bolt mechanism 52 is tied to a knob 44 that also controls transitions of the removable component 12 between operational and dormant states. *See id.* at ¶¶ [0020]-[0021]. Specifically, in one position, the knob 44 places the computer component 12 in a dormant state and places the bolt mechanism 52 in the unlocked position. *See id.* When actuated to another position, the knob 44 places the computer component 12 in an operational state and places the bolt mechanism 52 in a locked position. *See id.* Thus, in the exemplary assembly, the computer component 12 cannot be engaged or disengaged with respect to the computer device 10 while in the operational state, mitigating that risk of damage to the computer component 12 and the computer device 10.

With this in mind, Applicants respectfully assert that the pending claims are patentable over the cited references, taken alone or together.

Claim Rejections Under 35 U.S.C. § 102

In the Office Action, claims 1-6, 8-10, 12-19, and 21-25 were rejected under 35 U.S.C. § 102(e) as anticipated by the Hidaka et al. reference (U.S. Patent Application Publication No. 2004/0012921; hereinafter "Hidaka"). With regard to independent claims 1, 9, 14, and 23 and dependent claims 6 and 10, the Examiner stated as follows:

> Referring to claims 1 and 14, Hidaka discloses a locking mechanism (see Figs. 4 and 5) for coupling and uncoupling a removable component (400) coupleable to and from a computer device, comprising a first member (402) selectively positionable between secured and unsecured configurations of the removable component with respect to the computer device (see Figs 9-10), and a second member or engaging member (501) positionable between first and second configurations (see Figs. 18-20), wherein the first configuration extends the second member (501) through the first member (402) in the secured configuration to secure the first member.

Referring to claims 6-8, Hidaka discloses a locking mechanism as claimed, wherein the pivotable member (503) is configured to transition the removable component selectively between an operational (powered) configuration and a dormant (un-powered) configuration (see Figs. 18-20), wherein the locking mechanism is configured to set the removable component (400) in the dormant configuration during a transition between the secured and unsecured configurations. See Figs. 19 and 20 and the corresponding specification.

Referring to claim 9, Hidaka discloses a locking mechanism (see Figs. 4 and 5) for coupling and uncoupling a removable component (400) coupleable to and from a computer device (300), comprising a leveraging member (402) configured to at least partially disengage a removable component with respect to a computer device, an engaging member (501) selectively positionable in first and second positions such that the engaging member at least partially engages with the leveraging member in the first position, and a pivotable member (502) coupled to the engaging member such that pivotal movement of the pivotable member actuates the engaging member along a longitudinal axis of the engaging member. See Fig. 18 and paragraphs 0098-0106.

Referring to claim 10, Hidaka discloses a locking mechanism as claimed, wherein the pivotable member (503) is configured to transition at least one of the removable component (400) and computer device (300) between an operational configuration and a dormant configuration. See Figs. 18-20 and the corresponding specification.

• • • •

Referring to claims 23-25, the method steps are necessitated by the device disclosed in Hidaka.

Office Action mailed April 7, 2005, pp. 2-4.

Respectfully, Applicants traverse the Examiner's rejections, because Hidaka does not disclose all of the features recited in independent claims 1, 9, 14, and 23, as well as the claims depending therefrom. Anticipation under Section 102 can be found only if a single reference shows exactly what is claimed. *See Titanium Metals Corp. v. Banner*, 227 U.S.P.Q. 773 (Fed. Cir.1985). For a prior art reference to anticipate under Section 102, every element of the claimed invention must be identically shown in a single reference. *See In re Bond*, 15 U.S.P.Q.2d 1566 (Fed. Cir.1990). Moreover, the prior art reference also must show the identical invention "in as complete detail as contained in the ... claim" to support a *prima facie* case of anticipation. *Richardson v. Suzuki Motor Co.*, 9 U.S.P.Q. 2d 1913, 1920 (Fed. Cir. 1989) (emphasis added). Additionally, for anticipation, the cited reference must not only disclose all of the recited features but must also disclose the part-to-part relationships between these features. *See Lindermann Maschinenfabrik GMBH v. American Hoist & Derrick*, 221 U.S.P.Q. 481, 486 (Fed. Cir.1984). Accordingly, Applicants need only point to a single element or claimed relationship not found in the cited reference to demonstrate that the cited reference fails to anticipate the claimed subject matter. A strict correspondence between the claimed language and the cited reference must be established for a valid anticipation rejection.

Furthermore, Applicants respectfully submit that, during patent examination, the pending claims must be given an interpretation that is reasonable and consistent with the specification. *See In re Prater*, 162 U.S.P,Q. 541, 550-51 (C.C.P.A. 1969; *In re Morris*, 44 U.S.P.Q.2d 1023, 1027-28 (Fed. Cir. 1997); see also M.P.E.P. § 2111 (describing the standards for claim interpretation during prosecution). Interpretation of the claims must also be consistent with the interpretation that those skilled in the art would reach. *See In re Cortright*, 49 U.S.P.Q.2d 1464, 1468 (Fed. Cir. 1999); *see also* M.P.E.P. § 2111. That is, recitations of a claim must be read as they would be interpreted by those of ordinary skill in the art. *See Rexnord Corp. v. Laliram Corp.*, 60 U.S.P.Q.2d 1851, 1854 (Fed. Cir. 2001); *see also* M.P.E.P. § 2111.01. In summary, an Examiner, during prosecution, must interpret a claim recitation as one of ordinary skill

in the art would reasonably interpret the claim in view of the specification. *See In re American Academy of Science Tech Center,* 70 U.S.P.Q.2d 1827 (Fed. Cir. 2004).

Independent Claims 1 and 14 and the Claims Depending Therefrom

As examples of recited features missing from cited reference, Hidaka does not disclose a locking mechanism in which a second member extends through a first member in the secured configuration of the removable component, as is recited in claim 1, nor does Hidaka disclose an engaging member that extends through a first member for at least partially disengaging the removable component, as is recited in claim 14. By contrast, Hidaka simply discloses an assembly in which a restricting lever 501 pivots into a position that blocks actuation of an operation button 407, at no time extending through any other component, let alone extending through the component lever 402 as is asserted by the Examiner. Hidaka describes a module 400 that is removable from its enclosure 300 by pressing an operation button 407 inwardly. *See* Hidaka, ¶ [0089]; FIG. 11. Specifically, pressing the operation button 407 inward facilitates release of lever 402, which may then be grasped by a user to pull the component 400 from the enclosure 300. *See id.* at ¶¶ [0090]-[0092], [0095]. To prevent release of the lever 402, Hidaka describes pivoting restriction lever 501 from a horizontal position to a vertical position, resultantly placing the restriction lever 501 in a lock part-receiving recess 426. *See id.* at ¶ [0108]; FIG. 7. When in this recess 426, the restriction lever 501 is located behind the operation button 407, thereby preventing the button's inward actuation. *See id.* at 407. Thus, restriction lever 501 does not extend through the lever 402, but instead rest behind operation button 407 to prevent this button's actuation. Indeed, FIG. 7 of Hidaka well illustrates the physical separation and independence of restriction lever 501 and lever 402 with respect to one another.

Dependent Claims 6-8, 10 and 11

Additionally, Applicants respectfully assert that Hidaka does not disclose features recited in the dependent claims of the present application. For example, Hidaka does not disclose a pivoatable member that transitions the removable component

selectively between an operational configuration and a dormant configuration, as is recited in dependent claims 6 and 10. In the Hidaka device, the keylock mechanism 503--which the Examiner alleged is anticipatory of the claimed pivotable member--does not transition module 400 between an operational configuration and a dormant configuration. Rather, the keylock mechanism 503, when activated by the key 520, only prevents the modules from being "mounted to or removed from the enclosure." *See* Hidaka ¶ [0107]; FIGS. 19-20. Specifically, the keylock mechanism 503 prevents the operation of the operation button 407, and the "locking operation prevents the module 400 from being pulled out of the enclosure," as is discussed above. *See* Hidaka ¶ [0110]; FIGS. 18-20. However, in no way does the keylock mechanism 503 transition the removable component between an operational and dormant state. The keylock mechanism 503 only affects the module 400 through a mechanical linkage via operation of the restriction lever 501. When the module 400 is inserted the enclosure 300, the hard disk drive device 401 (HDD) enclosed in the module connects to a connecter 408, which is in turn electrically connected to a back board 310. *See* Hidaka ¶ [0056]; FIGS. 3-4. And this electrical engagement is independent of the keylock mechanism 503, because toggling this mechanism 503 only effectuates a mechanical engagement between the enclosure 300 and component 400.

Thus, Applicants respectfully assert that Hidaka does not disclose all of the features recited in independent claim 1 and independent claim 14, as well as their respective dependent claims. Accordingly, Applicants respectfully assert that Hidaka does not anticipate independent claim 1 and its respective dependent claims 2-6 and 8, nor does Hidaka anticipate independent claim 14 and its respective dependent claims 15-22. With the foregoing in mind, Applicants respectfully request reconsideration and allowance of claims 1-6, 8, and 14-22.

Independent Claim 9 and Claims Depending Therefrom

By way of example, Applicants respectfully assert that Hidaka does not disclose an engaging member that at least partially engages with a lever member configured to at least partially disengage a removable component with respect to a computer device, as is recited in independent claim 9. Instead and in contrast to the Examiner's assertions, the restriction lever 501 simply rests behind operation button 407, and at no time engages with lever 402. As discussed above, in the Hidaka device the operation restriction lever 501 enters the part-receiving recess 426 and "engages the operation button 407 top restrict (lock) the operation of the operation button." *See* Hidaka, ¶ [0099] (emphasis added). As best illustrated in FIG. 7 of Hidaka, when in this blocking position, the restriction lever 501 is relatively distant from the lever 402 and, as such, does not and cannot engage with the lever 402.

Thus, Applicants respectfully assert that Hidaka does not disclose all of the features recited in independent claim 9. Accordingly, Applicants respectfully assert that Hidaka does not anticipate independent claim 9, and its respective dependent claims 10-13. With the foregoing in mind, Applicants respectfully request reconsideration and allowance of claims 9-13.

Independent Claim 23 and the Claims Depending Therefrom

Additionally, Applicants respectfully assert, by way of example, that Hidaka does not disclose a locking mechanism that actuates an engaging member through a pivotable member, as is recited in independent claim 23. Instead, as is discussed above and in contrast the Examiner's assertions, restriction lever 501 does not extend through lever 402. Restriction member 501 merely pivots into a part-receiving recess 426 and, resultantly, blocks inward actuation of operation button 407. *See* Hidaka, ¶ [0099]. As best illustrated by FIG. 7 of Hidaka, operation lever 501 merely sits behind button 407, at no time extends through another member, let alone extending through lever 402.

Thus, Applicants respectfully assert that Hidaka does not disclose all of the features recited in independent claim 23. Accordingly, Applicants respectfully assert

that Hidaka does not anticipate independent claim 23, and its respective dependent claims 24-25. With the foregoing in mind, Applicants respectfully request reconsideration and allowance of claims 23-25.

Claim Rejections Under 35 U.S.C. § 103(a)

In the Office Action, dependent claim 20 was rejected under 35 U.S.C. § 103(a) as obvious in view of Hidaka and the Tsang et al. reference (U.S. Patent No. 6,728,099; referred to hereinafter "Tsang"). However, Applicants respectfully assert that the addition of Tsang does not obviate the deficiencies of Hidaka as discussed above with respect to the independent claims of the present application. Accordingly, Applicants respectfully assert that dependent claim 20 is patentable not only by virtue of its dependence upon allowable base claim 14, but also by virtue of the additional features recited therein. With the foregoing in mind, Applicants respectfully request reconsideration and allowance of dependent claim 20.

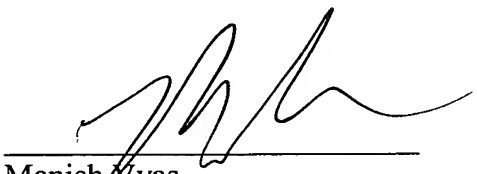
New Claim 26

Keeping in mind the discussion regarding Hidaka and Tsang above, Applicants respectfully assert that new claim 26 is also patentable and in condition for allowance. Respectfully, allowance of this claim is requested.

Conclusion

In view of the remarks set forth above, Applicants respectfully request allowance of all pending claims. If the Examiner believes that a telephonic interview will help speed this application toward issuance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,



Date: July 7, 2005

Manish Vyas
Reg. No. 54,516
(281)970-4545

CORRESPONDENCE ADDRESS

HEWLETT-PACKARD COMPANY
Intellectual Property Administration
P.O. Box 272400
Fort Collins, Colorado 80527-2400